EXHIBIT C



MICHAEL R. MCDONALD Director

Gibbons P.C. One Gateway Center Newark, New Jersey 07102-5310 Direct: (973) 596-4827 Fax: (973) 639-6295 mmcdonald@gibbonslaw.com

August 31, 2023

By Electronic Mail (lweaver@bfalaw.com; mmelamed@bfalaw.com; jsamra@bfalaw.com)

Lesley E. Weaver, Esq. Matthew Melamed, Esq. Joshua D. Samra, Esq. Bleichmar Fonti & Auld LLP 1330 Broadway, Suite 630 Oakland, California 94612

Re: White, et al. v. Samsung Electronics America, Inc., et al. Case No. 17-1775 (MCA)(JSA) Follow Up on August 24, 2023 Letter and Meet and Confer of August 31, 2023

Counsel:

This is a follow up to our letter of August 24, 2023 and the meet and confer thereafter conducted by the parties on Thursday August 31, 2023. While there were various discovery issues discussed on our video conference, this letter will confirm our understanding of Plaintiffs' position relating to Plaintiffs' responses to (i) the discovery as outlined in the August 24, 2023, (ii) Inspection Notices to Plaintiffs, and (iii) Deposition Notices to Plaintiffs.

First, on behalf of Plaintiffs, you have agreed to amend their answers to Interrogatories to provide the information requested in the August 24, 2023 letter relating to *all* of Cauley's and White's Samsung Smart TVs, not just those identified in the Complaint, and including information from White's Smart TV located in Kentucky that was promised some weeks ago. The only caveat is that the screen on one of Cauley's Smart TVs is not working. You advised Plaintiffs would provide an update on gathering this information by the end of next week (or by September 8). With regard to Plaintiffs' document production as referred to in the August 24, 2023 letter, you advised that additional productions from Plaintiffs would be forthcoming and again Plaintiffs would provide an update by the end of next week.

With regard to Inspection Notices served on Plaintiffs, we have agreed to provide an inspection protocol generally outlining the actions intended to be taken with Plaintiffs' Smart TVs, which may alleviate any potential objections Plaintiffs might raise. You requested that the inspections take place where the Smart TVs are located, and we asked that you advise the location of each of the Smart TVs identified in the August 24 letter.

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As for the Deposition Notices to Plaintiffs, we asked that you provide dates for depositions in New Jersey as soon as practicable. As for Plaintiff White we acknowledge your preference that his deposition be conducted in Miami. We can discuss later the location for this deposition but be advised that there is ample legal authority supporting the position that the deposition of a named plaintiff in a lawsuit filed in the District of New Jersey is properly conducted within the District of New Jersey. While we disagree presently on the location, you have agreed to provide dates by the end of next week.

Finally, we reminded you that Plaintiffs had refused to produce the named Plaintiffs for depositions until Samsung produced data available relating to their Smart TVs. We emphasized that it is not possible to even investigate whether data related to Plaintiffs' Smart TVs is available until Plaintiffs supply the unique identifiers associated with those Smart TVs, all of which is outlined in the August 24 letter.

If you believe this letter misstates or misconstrues our discussion, kindly advise.

* * * * * *

Thank you for your attention to this matter.

Very truly yours,

Michael R. McDonald

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MRM/mmm

cc: All Counsel of Record